

**THOMPSON HINE LLP**

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*Counsel for Defendant  
Fortnoff Financial, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
TRENTON VICINAGE**

ATLAS DATA PRIVACY  
CORPORATION, as assignee of  
individuals who are Covered Persons,  
JANE DOE-1, a law enforcement officer,  
JANE DOE-2, a law enforcement officer,  
EDWIN MALDONADO, SCOTT  
MALONEY, JUSTYNA MALONEY,  
PATRICK COLLIGAN, and WILLIAM  
SULLIVAN,

Plaintiffs,

- against -

FORTNOFF FINANCIAL, LLC,  
RICHARD ROES 1-10, fictitious names  
of unknown individuals and ABC  
COMPANIES 1-10, fictitious names of  
unknown entities,

Defendants.

Civil Action No. 3:24-cv-04390-HB

**MOTION TO APPEAR  
*PRO HAC VICE* FOR  
JENNIFER A. ADLER, ESQ.**

PLEASE TAKE NOTICE that the undersigned attorneys for Defendant Fortnoff Financial, LLC (“Fortnoff”) move this Court for an Order admitting Jennifer A. Adler *pro hac vice* in this matter on May 6, 2024.

PLEASE TAKE FURTHER NOTICE that the moving party shall rely upon the attached Certification of J. Timothy McDonald and Certification of Jennifer A. Adler. A proposed Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Fortnoff waives oral argument if there is no objection.

Date: April 8, 2024

/s/ J. Timothy McDonald  
J. Timothy McDonald, Esq.  
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**CERTIFICATE OF SERVICE**

I certify that on this date I caused the Motion for *Pro Hac Vice* Admission of Jennifer A. Adler, Certification of J. Timothy McDonald in support of Motion for *Pro Hac Vice* Admission, Certification of Jennifer A. Adler in support of Motion for *Pro Hac Vice* Admission, and Proposed Order Admitting Attorney *Pro Hac Vice* to be filed with the Clerk of Court for the United States District Court for the District of New Jersey by using the CM/ECF system and understand that electronic notice of the filing will automatically be sent to all counsel of record.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 8, 2024

/s/ J. Timothy McDonald  
J. Timothy McDonald